

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

RONALD STOLLE,	:	
	:	
Plaintiff,	:	Case No. 5:12 cv 1488
	:	
v.	:	JUDGE ADAMS
	:	
KENT STATE UNIVERSITY, et al.,	:	MAGISTRATE JUDGE LIMBERT
	:	
Defendants.	:	

DEFENDANT’S WITNESSES AND EXHIBITS LIST

- I. **Witnesses for Trial:** In addition to those witnesses listed in Plaintiff’s list of witnesses, submitted with plaintiff’s witness and exhibit list, Defendant anticipates calling the following witnesses:
1. **Ronald Stolle, Plaintiff:** Claims against John Thornton.
 2. **John Thornton, Chair of Department of Finance:** January 13, 2011 meeting regarding Stolle’s letter to elected officials and Stolle’s non-renewal.
 3. **Kathryn Wilson, Associate Professor:** Stolle’s non-renewal.
 4. **Iris Harvey, Vice President for University Relations and Chief Officer for Marketing, Communications and Government Relations:** Stolle’s letter to elected officials.
 5. **Richard Kolbe, former Associate Dean of Faculty in the College of Business Administration:** January 13, 2011 meeting regarding letter to elected official and Stolle’s employment.
 6. **Mark McLeod, Manager, University Benefits:** Parties are working on a stipulation of damages. However, in the event that the parties are unable to

agree to a stipulation as to the amount of Plaintiff's lost wages and fringe benefits for damage purposes, Mr. McLeod will testify as a witness regarding damages.¹

II. Exhibit List:

1. Collective Bargaining Agreement, Effective August 16, 2009, for Kent State University and The Full-Time Non-Tenure Track Faculty Unit of the American Association of University Professors, Kent State Chapter
2. Kent State Policy 5-03(A): University policy regarding appearances before governmental officers
3. April 19, 2010 Email from John Thornton to Richard Kolbe, Subject "Ron Stolle Travel Reimbursements"
4. April 25, 2010 Email Correspondence between John Thornton and Richard Kolbe, Subject "Dr. Stolle's Salary Adjustment Request"
5. November 3, 2010 Letter from Ronald Stolle to The Honorable Kristina Daley Roegner, State Representative Elect
6. November 3, 2010 Letter from Ronald Stolle to The Honorable Frank La Rose, State Senator Elect
7. January 4, 2011 Letter to The Honorable William G. Batchelder from Ronald Stolle
8. First page of January 4, 2011 letters to various legislators from Ronald Stolle
9. January 13, 2011 Memo to File Written by John Thornton
10. January 14, 2011 Email from Richard Kolbe to Iris Harvey, Subject "Faculty Communication to Speaker Batchelder"
11. January 13-14, 2011 Email Correspondence between Richard Kolbe and Yank Heisler, Subject "Faculty Communication to Speaker Batchelder"
12. Columbus Dispatch Article, "Ron Stolle: Eliminating tenure would save money"
13. Cleveland Plain Dealer Article, "End higher-ed tenure in Ohio and lower costs for students: Ronald Stolle"

¹ Defendant will respond to Plaintiff's Motion in Limine regarding Mr. McLeod.

14. January 18, 2011 Letter from Robert G. Frank to The Honorable William G. Batchelder, "Re: Letter Dated January 4, 2011 from Kent State Faculty Member"
15. January 19, 2011 Email from John Thornton to Mark Holder, Jayram X. Muthuswamy, and Xinlei Zhao, Subject "Civility"
16. April 5, 2011 Letter from John Thornton to Ronald Stolle regarding Reappointment
17. May 2, 2011 Letter from Ronald Stolle to State Representative Christina Roegner, Subject "Ohio Student Affordability of a Quality Public Higher Education"
18. May 16, 2011 Email from Ronald Stolle to Kristina Roegner, Subject "University Tenure"
19. July 6, 2011 Kent State University Employment Contract Non-Tenure Track Faculty for Ronald Stolle
20. August 24, 2011 Email from John Thornton to David Dumpe and Ronald Stolle, Subject "Full-Time Non-Tenure Track Faculty Reviews AY 2011-2012"
21. Kathryn Wilson's notes from January 24, 2012 meeting with John Thornton
22. David Dumpe's Reappointment Materials from Spring 2012.
23. February 1, 2012 Letter from John Thornton to David Dumpe, Subject "Review of Performance"
24. Ronald Stolle's Curriculum Vitae, as submitted with Spring 2012 Reappointment Materials
25. Ronald Stolle's Transcript from The George Washington University
26. Emails from February 23-28, 2012 from Muthuswamy, Beier, Holder, Zhao regarding Stolle's reappointment
27. February 29, 2012 Letter from John Thornton to Ronald Stolle, Subject "Review of Performance"
28. March 5, 2012 Letter from Kathryn Wilson to Ronald Stolle
29. March 28-29, 2012 Email Correspondence between Kathryn Wilson and Ronald Stolle, Subject "NTT Promotion"
30. April 11, 2012 Email from Ronald Stolle to Jarrod Tudor
31. Stolle's Notification of Separation

32. June 13, 2012 Letter from Ronald Stolle to John Thornton, Subject “Retirement”
33. Demonstrative exhibit comparing Plaintiff and David Dumpe, to be used in closing argument

Respectfully submitted,

MICHAEL DEWINE (0009181)
Ohio Attorney General

/s/ Peggy W. Corn
PEGGY W. CORN (0042197)
Trial Counsel
HOLLY LeCLAIR WELCH (0082346)
Assistant Attorneys General
Ohio Attorney General’s Office
Education Section
30 East Broad Street, 16th Floor
Columbus, OH 43215
Phone: (614) 644-7250
Fax: (614) 644-7634
Email: Holly.Welch@OhioAttorneyGeneral.gov
Peggy.Corn@OhioAttorneyGeneral.gov

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that this Defendants' Witnesses and Exhibits List was filed electronically on December 27, 2013. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Peggy W. Corn
Assistant Attorney General